



## 2.5 PROTECTING DATA AND PRIVACY

- Safeguarding proprietary, customer, and employee data with robust security measures.
- Ensuring compliance with all applicable data protection regulations.

## 2.6 ENABLING TRANSPARENCY AND ACCOUNTABILITY

- Conducting regular self-assessments to evaluate adherence to this Code.
- Providing transparent reporting mechanisms for employees and stakeholders to raise concerns.

# CODE OF CONDUCT

## 1 INTRODUCTION

This Code of Conduct ("Code") is the solemn commitment issued by Mixvoip SA, 70 rue des Prés L-7333 Steinsel – Luxembourg  
Mixvoip Srl, Avenue de Finlande 5 – B-1420 Braine l'Alleud – Belgium  
Mixvoip GmbH, Max-Planck-Strasse 22 D-54296 Trier – Germany  
Mixvoip SAS, 4 rue Marconi F-57000 Metz – France  
hereinafter "Mixvoip".

Mixvoip is committed to conducting business ethically and responsibly and expects the same from its suppliers, partners, and stakeholders. This Code of Conduct ("Code") sets forth the minimum standards for workplace and business practices that all employees, partners, and suppliers must adhere to while engaging with Mixvoip. This Code represents Mixvoip's dual commitment to ethical principles and compliance, as well as its responsibility to hold itself and its suppliers accountable to these standards.

This Code outlines the commitments Mixvoip makes to its stakeholders and the obligations of its suppliers and partners to ensure ethical and responsible business practices. It aligns with Mixvoip's values and the principles of the United Nations Global Compact regarding human rights, labor, the environment, and anti-corruption. Compliance with this Code is mandatory and may be subject to verification through audits, self-assessments, and other monitoring methods. Violations of this Code may result in immediate corrective actions, suspension, or termination of the business relationship.

In the event of a discrepancy or inconsistency between the English language version and any other language version of this Code, the English version shall prevail, govern and control.

## 2 MIXVOIP'S COMMITMENTS

Mixvoip is dedicated to:

### 2.1 MAINTAINING ETHICAL BUSINESS PRACTICES

- Ensuring integrity, transparency, and fairness in all business dealings.
- Avoiding conflicts of interest and prohibiting bribery, corruption, and fraudulent practices.
- Promoting a culture of compliance and accountability within the organization.

### 2.2 RESPECTING HUMAN RIGHTS AND FAIR TREATMENT

- Upholding the rights and dignity of all employees, customers, and partners.
- Fostering a diverse, equitable, and inclusive workplace free from discrimination and harassment.

### 2.3 PROVIDING SAFE AND HEALTHY WORKING CONDITIONS

- Complying with occupational health and safety regulations.
- Ensuring all employees have access to a safe, respectful, and supportive work environment.

### 2.4 MINIMIZING ENVIRONMENTAL IMPACT

- Committing to sustainable business practices, including reducing emissions and waste.
- Promoting resource efficiency and responsible environmental stewardship.

## 3 FRAMEWORK ELEMENTS FOR SUPPLIERS

### 3.1 COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers must maintain awareness of and comply with all applicable laws, regulations, and industry standards in the countries where they operate. This includes, but is not limited to:

- Anticorruption laws;
- Customs regulations;
- Export and trade control laws; and
- Fair dealing and competition laws.

Suppliers are expected to keep precise financial and business records in accordance with applicable laws, regulations, and recognized accounting standards and practices. They must not produce, use, or accept any fraudulent or misleading documents, accounts, or records or create fictitious entities, transactions, services, loans, or other financial arrangements related to Mixvoip. Suppliers are also required to disclose all relevant information accurately and promptly to ensure transparency and accountability in their business relationship. Where stricter local laws or regulations exist, compliance with the stricter requirements is expected.

### 3.2 ETHICAL BUSINESS PRACTICES

Mixvoip and its suppliers must conduct business with integrity and transparency. This includes:

- Prohibiting bribery, kickbacks, and corruption;
- Avoiding conflicts of interest that could compromise ethical business decisions;
- Allowing only nominal gifts or business entertainment that comply with the following guidelines: Related to legitimate business purposes; Permissible under applicable laws; Not in the form of cash or equivalents; Free of any obligation or appearance of preferential treatment.

### 3.3 PROHIBITION OF CHILD AND FORCED LABOR

Suppliers are strictly prohibited from engaging in practices that exploit labor. This includes:

- Employing only workers who meet the applicable legal minimum age, with no employee under 16 years of age;
- Ensuring young workers (16-18) are not engaged in hazardous work, night shifts, or excessive hours;
- Prohibiting forced, bonded, indentured, or involuntary prison labor;
- Prohibiting (or failure to efficiently prevent) human trafficking.
- Avoiding practices that restrict employees from leaving their employment, such as withholding identification documents.

### 3.4 RESPECT FOR HUMAN RIGHTS AND FAIR TREATMENT

Mixvoip and its suppliers are required to:

- Prevent discrimination on any grounds, on the basis of race, origin, caste, gender, religion, political affiliation, gender identity and expression, sexual orientation, marital status, disability, age (...).
- Prohibit harassment, abuse, and intimidation in the workplace;
- Promote diversity, equity, and inclusion, ensuring fair treatment and dignity for all employees.

### 3.5 REASONABLE WORKING CONDITIONS

Suppliers must provide:

- Safe and healthy working environments that comply with occupational health and safety laws;
- Reasonable working hours, not exceeding 60 hours per week (including overtime);
- At least one day off every seven days;
- Fair wages, including overtime pay, in accordance with applicable laws and employment contracts.
- Shall not tolerate violence in the workplace, which may include physical intimidation, direct or implied threats to physically harm others, bullying, stalking, or violent outbursts.

### 3.6 ENVIRONMENTAL RESPONSIBILITY

Mixvoip expects its suppliers to adopt environmentally responsible practices, including:

- Compliance with environmental laws and regulations;
- Minimization of emissions, waste, and energy consumption;
- Implementation of sustainable resource management practices.

In addition, Suppliers shall develop, implement, and maintain environmental best practices to reduce and minimize air and noise emissions, wastewater discharges, waste generation, biodiversity loss and deforestation. Suppliers are expected to prioritize reuse and recycling of materials, preserve soil health, respect animal welfare, and promote resource efficiency, and implement continuous improvement practices in sustainable material management and responsible chemical management.

### 3.7 DATA PROTECTION AND CONFIDENTIALITY

Suppliers must:

- Safeguard Mixvoip's proprietary and confidential information, including customer and employee data;
- Adhere to data protection regulations, such as GDPR;
- Ensure that personal and sensitive data is handled responsibly and transparently.

### 3.8 VERIFICATION AND MONITORING

Mixvoip reserves the right to verify compliance with this Code through:

- Periodic audits and assessments;
- Self-assessment questionnaires;
- On-site visits by Mixvoip personnel or authorized third-party representatives.

Suppliers are expected to maintain accurate records that demonstrate compliance with this Code and cooperate fully with any verification activities.

## 4 ACCOUNTABILITY AND CORRECTIVE ACTIONS

Mixvoip expects all suppliers and partners to adhere strictly to this Code.

In cases of non-compliance:

- Suppliers will be notified of violations and required to take corrective actions within a specified timeframe;
- Relationships may be suspended until compliance is restored;
- Egregious or repeated violations may result in immediate termination of the business relationship.

Suppliers found to have engaged in practices such as child labor, forced labor, or falsifying compliance documentation may face immediate termination.

## 5 CONCLUSION

The Mixvoip Code of Conduct reflects our unwavering commitment to ethical business practices, human rights, and environmental sustainability.

These principles are not only foundational to Mixvoip's operations but are also mandatory obligations for our suppliers.

By adhering to this Code, we ensure mutual trust, foster strong partnerships, and contribute to a more responsible and sustainable global community. We look forward to working with suppliers and partners who share our vision and values.



Loïc DIDELOT, CEO, 30<sup>th</sup> of December 2024